

# LAW OFFICES OF SUSAN G. KELLMAN

25 EIGHTH AVENUE • BROOKLYN, NEW YORK 11217  
(718) 783-8200 • FAX (718) 783-8226 • SGK@KELLMANESQ.COM  
FELLOW, AMERICAN COLLEGE OF TRIAL LAWYERS

December 4, 2019

[SchofieldSDNYChambers@nysd.uscourts.gov](mailto:SchofieldSDNYChambers@nysd.uscourts.gov)

Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Centre Street  
New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>12/11/2019</u>
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Re: *United States v. Carlos Rondan Moreno*  
17 Cr. 479 (LGS)

Dear Judge Schofield,

I write to respectfully request that your Honor adjourn Carlos Rondan Moreno's sentencing, currently scheduled for January 28, 2020, until a date and time convenient to the Court in April 2020.

Counsel was very recently assigned to try a month-long sex trafficking case which will begin on March 2, 2020. (*U.S. v. Melendez Rojas*, 14 Cr. 434.) Between now and then I will need to: review extensive discovery (all of which is in Spanish); prepare and file motions, as appropriate; and propose jury instructions.

To add to the challenge, counsel continues to have difficulty engaging Spanish interpreters in light of the extraordinary number of Spanish speaking defendants both in the SDNY and the EDNY, owing to pending MS-13 and Latin American sex trafficking cases. Since neither Mr. Rondan Moreno, nor his family members speak English, preparing an appropriate sentencing submission, in accordance with the current schedule, continues to be a challenge.

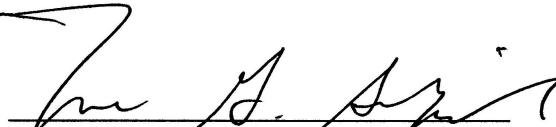
I have discussed this request for an adjournment with AUSA Kaylan Lasky, who has graciously consented.

Accordingly, on behalf of Mr. Rondan Moreno, we respectfully request an adjournment of his sentencing date until a date and time convenient to your Honor, in late April 2020. Your Honor's consideration of this request is appreciated.

Application Granted. Defendant Moreno's sentencing is adjourned to April 7, 2020 at 11:00 a.m. Defendant's submission shall be filed by March 16, 2020. The Government's submission shall be filed by March 19, 2020. The Clerk of the Court is directed to terminate the letter motion at docket number 30.

Respectfully submitted,  
/s/  
Susan G. Kellman

Dated: December 11, 2019  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE